

RCRA Inspection Report

EPA Identification Number: MI D 005358049

Installation Name: Chrysler Corp. Chemical Division

Location Address: 5437 W. Jefferson

City: Trenton

State: MI 48183,

Date of inspection: 12-18-84

Time of inspection (from) 9:30_{am} (to) 2:00_{pm}

Person(s) interviewed

Title

Telephone

Jim Desmond

Asst Main. & Eng. Supervisor (313) 671-4729

Peter Heckman

Manager Production Control (313) 671-4744

Ray Gryniewicz

Manufacturing Engineering (313) 671-4729

*

Inspector(s)

Agency/Title

Telephone

Kenneth L. Damrel

MDNR/HWD-Env. Eng. (313) 459-9180

Margaret A. Field*

MDNR/HWD-WQS (313) 459-9180

Installation Activity (mark only one box)

Inspection Form(s)

☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☒ Generation only

B

☐ Transportation only

C

* Dennis Buza

Labor Relations Supervisor

* Frank Brown

Maint. & Eng. Supervisor

US EPA RECORDS CENTER REGION 5



409671

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	<u>X</u>	___	___	___
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>35</u>				
(3) Do the manifest forms examined contain the following information? (If possible, make 262.21 copies of, or record information from, manifests that do not contain the critical elements)	<u>X</u>	___	___	___
a. Manifest document number?	<u>X</u>	___	___	___
b. Name, mailing address, telephone number, and EPA ID number of generator?	<u>X</u>	___	___	___
c. Name and EPA ID number of transporter(s)?	<u>X</u>	___	___	___
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<u>X</u>	___	___	___
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	___	___	___
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	___	___	___
g. Required certification?	<u>X</u>	___	___	___
h. Required signatures?	<u>X</u>	___	___	___
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<u>X</u>	—	—	_____
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	<u>X</u>	—	—	_____
(3) If required, are placards available to transporter? 262.33	<u>X</u>	—	—	_____
** (4) Pre-shipment Accumulation:				
** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.				
a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	<u>X</u>	—	—	_____
i. Is each container clearly marked with the date on which the period of accumulation began?	<u>X</u>	—	—	_____
ii. Have more than 90 days elapsed since the dates marked?	<u>X</u>	—	—	7 drums over 90 days 3 drums dated 9-8-84, 3 dated 9-17-84, 1 dated 9-16-84
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	<u>X</u>	—	—	_____
iv. Are containers in good condition?	<u>X</u>	—	—	_____
v. Are containers compatible with waste in them?	<u>X</u>	—	—	_____
vi. Are containers managed to prevent leaks?	<u>X</u>	—	—	_____
vii. Are containers stored closed?	<u>X</u>	—	—	_____
viii. Are containers inspected weekly for leaks and defects?	<u>X</u>	—	—	_____
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	<u>X</u>	—	—	_____

	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	X			
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			X	Sometimes have Zinc dust which is incompatible. None was available for inspection
b. Is hazardous waste accumulated in tanks? If no, skip to c. 262.34 (January 11, 1982 revision)	X			
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision)				
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
vi. Are required daily and weekly inspections done? 265.194				
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199				

Yes No NI Remarks

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers?

_____ X _____

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

Hand written, needs to be formalized & add additional job titles.

- i. Job Titles?
ii. Job Descriptions?
iii. Description of training?
iv. Records of training?
v. Did personnel receive the required training by 5-19-81?
vi. Do new personnel receive required training within six months?
vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training?

X _____
X _____
_____ X _____ See ① in Remarks section
X _____
X _____
_____ X _____ Unable to determine from records. Training given only once per year.
_____ X _____ Not specifically indicated. Initial training given to all once per year.

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31

_____ X _____

	Yes	No	NI	Remarks
ii. If required, does this facility have the following equipment: 265.32				
Internal communications or alarm systems?	<u>X</u>	___	___	___
Telephone or 2-way Radios at the scene of operations?	<u>X</u>	___	___	___
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u>X</u>	___	___	___

Indicate the volume of water and/or foam available for fire control:

231 Fire extinguishers, Fire hoses

iii. Testing and Maintenance of Emergency Equipment: 265.33				Company states the equipment is being inspected & maintained. No formal procedure or documentation exists
Has the owner or operator established testing and maintenance procedures for emergency equipment?	___	<u>X</u>	___	___
Is emergency equipment maintained in operable condition?	<u>X</u>	___	___	___
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	<u>X</u>	___	___	<u>Fire alarms</u>
v. Is there adequate aisle space for unobstructed movement?	___	<u>X</u>	___	___
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	<u>X</u>	___	___	<u>Verbally contacted see f.ii</u>
f. Contingency Plan and Emergency Procedures 265 Subpart D				
Does the contingency plan contain the following information:				
i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52	<u>X</u>	___	___	Plan is dated June 16, 1981. Needs to be updated.

	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	<u>X</u>	<u> </u>	<u> </u>	Hand delivered plan to local agencies. Will obtain documentation of receipt upon upcoming revision of contingency plan.
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	<u>X</u>	<u> </u>	<u> </u>	
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	<u>X</u>	<u> </u>	<u> </u>	
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	<u>X</u>	<u> </u>	<u> </u>	For Fire only. Facility determined not necessary for Hazardous Waste emergencies.
vi. Are copies of the Contingency Plan available at site and local emergency organizations?	<u>X</u>	<u> </u>	<u> </u>	
vii. Is the facility emergency coordinator identified?	<u>X</u>	<u> </u>	<u> </u>	Robert Campbell
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	<u> </u>	<u> </u>	Trained 12-5-84
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	<u> </u>	<u> </u>	
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?	<u> </u>	<u> </u>	<u>X</u>	None in past year with Hazardous Waste.

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

X _____

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)

262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

_____ X _____

- a. Exporting Hazardous Waste, has a generator:

- i. Notified the Administrator in writing?

- ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

- iii. Met the Manifest requirements?

- b. Importing Hazardous Waste, has the generator met the manifest requirements?

_____ ✓ _____

Remarks: ① Record of training does not state what ^{the} training covered, just that training was in accordance with Section 264.16.